

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

EDWARD L. GILMORE,

Plaintiff,

v.

ERIC HOLDER,
In his official capacity as
Attorney General of the United States,

Defendant.

Civil Action No. 1:13-cv-789 (LO/IDD)

**JOINT STIPULATION AND [PROPOSED] ORDER REGARDING PRE-DISCOVERY
SCHEDULING**

WHEREAS, Edward L. Gilmore (“Plaintiff”) commenced the above-captioned action against Eric Holder in his official capacity as Attorney General of the United States (“Defendant,” and together with Plaintiff, “the Parties”) on June 26, 2013;

WHEREAS the Parties, by and through their counsel, met and conferred on August 26, 2013 to discuss scheduling of pre-discovery matters;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties as follows:

1. Defendant shall respond to Plaintiff's complaint no later than September 27, 2013.

2. Should Defendant respond to the complaint by filing a motion pursuant to Rule 12 of the Federal Rules of Civil Procedure ("Motion"), the following schedule shall apply to briefing relating to the Motion:

- a. Plaintiff's Opposition to the Motion will be due October 18, 2013;
- b. Defendant's Reply to Plaintiff's Opposition to the Motion will be due November 1, 2013.

Dated: September 3, 2013

For the Plaintiff:

/s/
Bradford Hardin, Esq. (76812)
Eric Mahr, Esq.
Randall Weinsten, Esq.
Greg Butler, Esq.
WILMER CUTLER PICKERING
HALE AND DORR LLP
1875 Pennsylvania Avenue NW
Washington, DC 20006
Telephone: (202) 663-6000
Fax: (202) 663-6363

Attorneys for Plaintiff Edward L. Gilmore

For the Defendant:

/s/
R. Joseph Sher, Esq.
Ayana Free, Esq.
Assistant United States Attorneys
OFFICE OF THE UNITED STATES
ATTORNEY
Justin W. Williams Building
2100 Jamieson Avenue
Alexandria, VA 22314
Telephone: (703) 299-3747
Fax: (703) 299-3983

Attorneys for Defendant Eric Holder

PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.

Dated: _____, 2013

By: _____
The Honorable Liam O'Grady
United States District Judge